that if premises have been used as a playground for children for a long time, and have been safe for that period, and the owner makes a dangerous excavation or erection on them, which he leaves unguarded, it would be in the nature of a trap which would make him liable for injuries caused by it. 26 L. R. A. 687 and cases there cited. *Penso* v. *McCormick,* 125 Ind. 116; *Indianapolis* v. *Emmelman,* 108 Ind. 530.

PARENT AND CHILD—DUTY OF FATHER TO SUPPORT NOT ENFORCEABLE IN EQUITY.—Where a father had abandoned his children, and they had filed a bill in equity for a decree against him for a monthly maintenance allowance, to be made a lien upon his property. *Held,* that there was no authority for the assumption of equity jurisdiction in such a case, and that it would be against public policy and family unity to extend its jurisdiction to cover a suit of a child against its father. There was a strong dissenting opinion. *Rawlings* v. *Rawlings,* (Miss., 1919) 83 So. 146.

By the common law of England—which was followed in a few early American cases—a father was not legally bound to support his infant child, and would not be liable for necessaries furnished for the support of the child. *Urmston* v. *Newcomen,* 4 Ad. & El. 899; *Mortimer* v. *Wright,* 6 Mees. & W. 482; *Kelley* v. *Davis,* 49 N. H. 187; *Hunt* v. *Thompson,* 3 Scam. (Ill.) 179; *Gordon* v. *Potter,* 17 Vt. 348. But this doctrine has not been followed by the majority of American courts. *Dunbar* v. *Dunbar,* 190 U. S. 340; *Brown* v. *Brown,* 132 Ga. 712; *Gilley* v. *Gilley,* 79 Me. 292; and many others. See 13 MICH. L. REV. 345; 20 R. C. L. 622. However the remedy at law is very inadequate, since it requires credit to the infant, and generally a suit to recover for the necessaries. So there is much force in the argument of the dissenting opinion that such a remedy at law is inadequate for the infant. Now inadequacy of the remedy at law is a ground for equity jurisdiction, where there is an existing legal duty. *Garland* v. *Garland,* 50 Miss. 694; *Prather* v. *Prather,* 4 Dess. (S. C.) 33; *Glover* v. *Glover,* 16 Ala. 440. In these last cited cases, a wife was allowed to recover an allowance for her support from her husband, without a divorce. Also where the wife has brought a bill in equity for the maintenance and support of the children, it has been allowed. *Leibold* v. *Leibold,* 158 Ind. 60; *De Brauwere* v. *De Brauwere,* 203 N. Y. 460, commented on in 10 MICH. L. REV. 415. In many other cases equity courts have said that they had full jurisdiction over minors. *Williams* v. *Duncan,* 44 Miss. 375; *Johns* v. *Smith,* 56 Miss. 727. Nor has equity hesitated to make an allowance out of a minor's estate for its maintenance and support, where the father was unable to support the child at all, or in a station befitting its expectancy. *Watts* v. *Steele,* 19 Ala. 656. So from the above it does not seem that equity would have had much difficulty in assuming jurisdiction in such a case as the principal one. However the majority of the court, in the principal case, thought it was against public policy and family interests, to allow a suit by a minor in equity directly against its father. And in support of their contention they had the only authority, directly in point. *Huke* v. *Huke,* 44 Mo. App. 308.